

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Docket No. 1:13-md-2419-RWZ

THIS DOCUMENT RELATES TO:

All Cases

**JOINT STIPULATION FOR EXTENSION OF TIME FOR MEDICAL SALES
MANAGEMENT INC. AND MEDICAL SALES MANAGEMENT SW INC.
TO RESPOND TO ST. THOMAS ENTITIES' MOTION TO COMPEL**

Pursuant to Section A of MDL Order No. 11 (MDL No. 1524), Medical Sales Management, Inc., Medical Sales Management SW Inc. (collectively "MSM"), and the St. Thomas Entities¹ ("St. Thomas") hereby stipulate that MSM may have until October 5, 2015 to respond to St. Thomas' September 14, 2015 filing of its Motion to Compel Medical Sales Management, Inc. to Produce Certain Documents (MDL No. 2248) .

Dated: September 28, 2015

Respectfully submitted,

MEDICAL SALES MANAGEMENT, INC. and
MEDICAL SALES MANAGEMENT SW, INC.

By their attorneys,

/s/ Dan Rabinovitz

Dan Rabinovitz, Esq. (BBO #558419)
John K. Wells, Esq. (BBO #671345)
Greenberg Traurig LLP
One International
Boston, MA 02110
(617) 310-6000 (phone)
(617) 310-6001 (fax)

¹ Saint Thomas Health, Saint Thomas Network, and Saint Thomas West Hospital, formerly known as St. Thomas Hospital.

rabinovitzd@gtlaw.com
wellsj@gtlaw.com

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS NETWORK, AND
SAINT THOMAS HEALTH

By their attorneys,

/s/ Sarah P. Kelly
Sarah P. Kelly (BBO #664267)
NUTTER McCLENNEN & FISH LLP
Seaport West
155 Seaport Boulevard
Boston, Massachusetts 02210
(617) 439-2000 (phone)
(617) 310-9461 (fax)
skelly@nutter.com

OF COUNSEL:

Yvonne K. Puig*
Texas State Bar No. 16385400
Adam T. Schramek*
Texas State Bar No. 24033045
Eric J. Hoffman*
Texas State Bar No. 24074427
Norton Rose Fulbright US LLP
98 San Jacinto Blvd. Suite 1100
Austin, Texas 78701
(512) 536-2450
(512) 536-4598 (FAX)

Marcy Hogan Greer*
Texas State Bar No. 08417650
mgreer@adjtlaw.com

ALEXANDER DUBOSE JEFFERSON & TOWNSEND LLP
515 Congress, Suite 2350
Austin, Texas 78701
(512) 482-9300
(512) 482-9303

*Appearing *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2015, a true copy of the foregoing was filed in accordance with the Court's Electronic Filing Guidelines and will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Dan Rabinovitz
Dan Rabinovitz, Esq.